

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE; MISSISSIPPI STATE CONFERENCE OF THE NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE; JACKSON CITY BRANCH OF THE NAACP; DERRICK JOHNSON; FRANK FIGGERS; CHARLES TAYLOR; MARKYEL PITTMAN; CHARLES JONES; and NSOMBI LAMBRIGHT-HAYNES,

*Plaintiffs,*

v.

TATE REEVES, in his official capacity as Governor of the State of Mississippi; SEAN TINDELL, in his official capacity as Commissioner of Public Safety; BO LUCKEY, in his official capacity as Chief of the Mississippi Department of Public Safety Office of Capitol Police; MICHAEL K. RANDOLPH, in his official capacity as Chief Justice of the Mississippi Supreme Court; and LYNN FITCH, in her official capacity as Attorney General of the State of Mississippi,

*Defendants.*

**Civil Action No. 3:23-cv-272-HTW-LGI**

**PLAINTIFFS IN JXN UNDIVIDED COALITION v. TINDELL  
MOTION FOR CONSOLIDATION**

Pursuant to Federal Rule of Civil Procedure 42(a), Plaintiffs in Civil Action No. 3:23-cv-351-TSL-RPM, *Jxn Undivided Coalition, et al. v. Tindell, et al.*, hereby move for consolidation of their case, filed last week in this Court, with this action. As set forth more fully in the accompanying memorandum, consolidation is appropriate because: (1) the actions are pending in the same judicial district; (2) common parties are involved; (3) there are common questions of law or fact; (4) if the cases are tried separately, a risk of inconsistent adjudications of factual and legal issues would exist; (5) consolidation will conserve judicial resources; (6) consolidation will not result in an unfair advantage; (7) consolidation will reduce the time for resolving the cases; and (8) consolidation will reduce the cost of trying the cases separately.

Based on the foregoing; the exhibits attached to this motion, listed below; and the reasons set forth in Plaintiffs' accompanying memorandum of authorities, Plaintiffs respectfully submit that this action and Civil Action No. 3:23-cv-351-TSL-RPM should be consolidated for all purposes pursuant to Federal Rule 42(a) and Local Rule 42.

**Exhibit A:** Civil Cover Sheet in *Jxn Undivided Coalition v. Tindell*

**Exhibit B:** Complaint in *Jxn Undivided Coalition v. Tindell*

Submitted, this 7th day of June, 2023.

/s/ Paloma Wu

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